

GEORGE T. BOCHANIS, ESQ.
Nevada Bar No.: 2262
GEORGE T. BOCHANIS, LTD.
631 South Ninth Street
Las Vegas, Nevada 89101
Telephone: (702) 388-2005
Facsimile: (702) 388-9136
george@lvaccident.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LUIS TARANGO, individually

Plaintiff,
vs.

SMITH'S FOOD & DRUG CENTERS, INC.,
a Foreign Corporation; DOE EMPLOYEES I
through X, inclusive; DOES I through X,
inclusive; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

| Case No. 2:24-cv-01898-RFB-EJY

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES**

(First Request)

IT IS HEREBY STIPULATED AND AGREED UPON, by and between Plaintiff, LUIS TARANGO (“Plaintiff”) and Defendant, SMITH’S FOOD & DRUG CENTERS, INC., (“Defendant Smith’s”), and hereby submit the following **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF DISCOVERY DEADLINES (First Request)** for this Honorable Court’s consideration to extend the remaining deadlines in the current scheduling order and discovery plan in this matter for a period of forty-five (45) days for the reasons explained herein.

Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the first discovery extension requested in this matter.

1 **A. DISCOVERY COMPLETED TO DATE**

- 2 • The parties have conducted an FRCP 26(f) conference;
- 3 • On October 14, 2025, Plaintiff served his First Set of Requests for Production
- 4 of Documents;
- 5 • On November 14, 2024, Plaintiff served his First Set of Interrogatories;
- 6 • On November 14, 2024, Plaintiff served his Second Set of Requests
- 7 for Production of Documents;
- 8 • On November 25, 2024 Defendant served their Request for Admissions;
- 9 • On November 25, 2024 Defendant served their Requests for Production
- 10 of Documents;
- 11 • On November 25, 2024 Defendant served their Interrogatories;
- 12 • On November 25, 2025 Defendant served their Initial FRCP 26(f) Disclosure;
- 13 • On December 16, 2024 Defendant served their First Supplement to FRCP
- 14 26(f) Disclosure;
- 15 • On December 24, 2024, Plaintiff served his Initial FRCP 26(f) Disclosure;
- 16 • On January 7, 2025, Plaintiff served his First Supplement to FRCP
- 17 26(f) Disclosure;
- 18 • On January 2, 2025 Plaintiff served his Third Set of Requests for Production
- 19 of Documents;
- 20

21 **B. DISCOVERY TO BE COMPLETED**

22 Discovery to be completed includes:

- 23 • Deposition of Lynn Eva Small
- 24 • Deposition of Aleckis Ovheay De Jesus
- 25 • Depositions of Plaintiff's treating physicians;
- 26 • Depositions of fact witnesses; and
- 27 • Depositions of expert witnesses and rebuttal expert witnesses.
- 28 ///

1 **C. REASON DISCOVERY HAS NOT BEEN COMPLETED**

2 The Parties have been diligently working to complete discovery in this matter. The
 3 primary reason for this extension is to accommodate the scheduling of the depositions of two of
 4 Defendant's employees prior to the deadline for the motion to amend pleadings and add parties.
 5 Through discovery, Plaintiff was able to identify two specific individuals with direct knowledge
 6 of the events at issue, and has attempted to obtain dates of availability for their depositions.
 7 Plaintiff's counsel has not been available on the date proposed by Defendant and Defendants
 8 have been unavailable for the dates proposed by Plaintiff. Plaintiff's counsel has a firm trial
 9 beginning April 21, 2025, and it has been difficult to secure mutually agreeable dates prior to the
 10 current last date to amend pleadings and/or add parties. The parties request a 45-day continuance
 11 in order to have the depositions taken prior to the deadline so as to be able to add these
 12 individuals if deemed necessary.

13 The Parties agree that, pending this Court's approval, extension of remaining discovery
 14 deadlines is appropriate. Based upon the foregoing, the parties have agreed to a 45-day extension
 15 of all remaining deadlines imposed in the Joint Discovery Plan and Scheduling Order Pursuant to
 16 FRCP 26(f) and Local Rule 26-1(b) to ensure that meaningful discovery is conducted. The
 17 parties have acted in good faith to request this extension and have neither intent nor reason to
 18 delay the resolution of this matter.

19 **D. PRIOR DISCOVERY DEADLINES**

20 According to the Court's Scheduling Order and Discovery Plan entered on November 15,
 21 2022 [ECF No. 62], the initial deadlines were:

Amend Pleadings / Add Parties	April 29, 2025
Initial Expert Disclosures:	May 29, 2025
Rebuttal Expert Reports:	June 30, 2025
Close of Discovery	July 28, 2025
Dispositive Motions	August 27, 2025
Joint Pre-Trial Order	September 26, 2025

1 **E. PROPOSED DISCOVERY DEADLINES**

2 Based upon the foregoing, the Parties hereby stipulate to the below schedule and ask the Court to
3 allow the same.

4	Amend Pleadings / Add Parties	June 13, 2025
5	Initial Expert Disclosures:	July 14, 2025
6	Rebuttal Expert Reports:	August 14, 2025
7	Close of Discovery	September 11, 2025
8	Dispositive Motions	October 13, 2025
9	Joint Pre-Trial Order	November 10, 2025

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 1st of April, 2025

DATED this 1st of April, 2025

GEORGE T. BOCHANIS, LTD.

COOPER LEVENSON, P.A.

/s/ George T. Bochanis, Esq.
George T. Bochanis, Esq. SBN: 2262
631 So. Ninth St.
Las Vegas, Nevada 89101
Attorneys for Plaintiff

/s/ Scott L. Stonehocker, Esq.
Scott L. Stonehocker, Esq., SBN: 5512
3016 W. Charleston Blvd. #195
Las Vegas, Nevada 89102
Attorneys for Defendant

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Date: April 1, 2025